

.		
		FILED RECEIVED ENTERED SERVED ON
1	NICHOLAS A. TRUTANICH	COUNSEL/PARTIES OF RECORD
2	United States Attorney District of Nevada	
2	Nevada Bar Number 13644	JAN 2 2 2020
3	PETER WALKINGSHAW	
	Assistant United States Attorney	CLERK US DISTRICT COURT
. 4	400 South Virginia, Suite 900	DISTRICT OF NEVADA BY: DEPUTY
5	Reno, Nevada 89501 Phone: (775) 784-5438	DLI OTT
	Email: Peter. Walkingshaw@usdoj.gov	
6	GARY N. DONNER	
	Trial Attorney	
7	U.S. Department of Justice 601 D Street, N.W., Rm. 2144	
8	Washington, D.C. 20004	
•	(202) 305-0338	
9	Gary.Donner@usdoj.gov	
10	Attorneys for the United States of America	
10		
11	UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA	
12	UNITED STATES OF AMERICA,	No. 3:19-CR-00052-RCJ-WGC
13		
	Plaintiff,	
14	v.	AMENDED INFORMATION FOR VIOLATION OF:
15		VIOLATION OF:
	ROBERT BARKMAN,	16 U.S.C. §§ 1538(a)(1)(F) and 1540(b)(1) –
16	Defendant.	Sale and Interstate Shipment of Endangered
10		Species
17		18 U.S.C. § 2 – Aiding and Abetting
18		10 0.0.c. § 2 Monig and Abetting
,		
19		
20		<u>.</u>
20	THE UNITED STATES ATTORNEY CHARGES THAT:	
21		
22	COUNT ONE	
.22	(Sale and Interstate Shipment of Endangered Species)	
23		
	(16 U.S.C. § § 1538(a)(1)(F) and 1540(b)(1), and 18 U.S.C. § 2)	
24		

On or about and between March 24, 2016 and April 2, 2016, in the District of Nevada and elsewhere, the defendant

ROBERT BARKMAN,

knowingly sold in interstate commerce, and aided and abetted in the same, an endangered species of wildlife, that is, parts from endangered African lions (*Panthera leo*) and leopards (*Panthera pardus*), in violation of the Endangered Species Act of 1973, Title 16, United States Code, Sections 1538(a)(1)(F); and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

(Sale and Interstate Shipment of Endangered Species)

- 1. The allegations contained in Count One of this Amended Information are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 16 U.S.C. § 1640(e)(4)(A) with 28 U.S.C. § 2461(c) and 16 U.S.C. § 1640(e)(4)(B) with 28 U.S.C. § 2461(c).
- 2. Upon conviction of the misdemeanor offense charged in Count One of this Amended Information,

ROBERT BARKMAN,

defendant herein, shall forfeit to the United States of America, all fish and wildlife or plants taken, possessed, sold, purchased, offered for sale or purchase, transported, delivered, received, carried, shipped, exported, or imported contrary to the provisions of 16 U.S.C. § 1538(a)(1)(F), any regulation made pursuant thereto, or any permit or certificate issued herunder:

defendant herein, shall forfeit to the United States of America, all guns, traps, nets, and other equipment, vessels, vehicles, aircraft, and other means of transportation used to aid the taking, possessing, selling, purchasing, offering for sale or purchase, transporting, delivering, receiving, carrying, shipping, exporting, or importing of any fish or wildlife or plants in violation

Case 3:19-cr-00052-RCJ-WGC Document 10 Filed 01/22/20 Page 3 of 3

1	of 16 U.S.C. § 1538(a)(1)(F), any regulation made pursuant thereto, or any permit or certificate		
2	issued thereunder:		
3	1. I-1, one skull 2. I-2, one skull		
4	3. I-3, tooth pendant kit with teeth		
5	eight teeth/tusks, one bag with eighteen teeth and one bag with thirteen teeth		
6	5. J-1, one bag of sixty claws, one bag with nine claws, one bag with four teeth, and one bag with four teeth		
7	6. J-2, one claw 7. F-1, one four teeth and five claws		
8	8. F-2, one skull 9. F-3, one skull		
9	10. F-4, one skull 11. F-5, one skull 12. F 6 one rioss of house		
10	12. F-6, one piece of bone 13. E-1, one bag with one spotted cat pelt 14. S-1, one shipping box with label (all of which constitutes property)		
11	14. S-1, one shipping box with label (all of which constitutes property); All pursuant to 16 U.S.C. § 1538(a)(1)(F); 16 U.S.C. § 1540(e)(4)A) with 28 U.S.C.		
12	2 § 2461(c); 16 U.S.C. § 1540(e)(4)(B) with 28 U.S.C. § 2461(c).		
13	Dated this 22 nd day of January, 2020.		
14	/s/		
15	PETER WALKINGSHAW Assistant United States Attorney		
16			
17			
18			
19			
20			
21			
22			
23			